

Exhibit A

From: [Waxman, Daphna A.](#)
To: [Guo, Joy](#); [Tenreiro, Jorge](#); [Bliss, Dugan](#); [Daniels, Jon](#); [Stewart, Ladan F](#); [Hanauer, Benjamin J.](#); [Moye, Robert M.](#)
Cc: [Ceresney, Andrew J.](#); [Zornberg, Lisa](#); [Cowan, Jennifer R.](#); [Gulay, Erol](#); [Hirsch, Matt](#); ["msolomon@cgsh.com"](#); ["mflumenbaum@paulweiss.com"](#); ["Bunting, Kristina" \(kbunting@paulweiss.com\)"](#); ["ajanghorbani@cgsh.com"](#); [Kellogg, Michael K.](#); [Figel, Reid M.](#); ["mgertzman@paulweiss.com"](#); ["slevander@cgsh.com"](#)
Subject: RE: SEC v. Ripple Labs - Meet and Confer Letter
Date: Saturday, May 8, 2021 12:21:10 PM

Joy –

Thank you for confirming that you will produce Breanne Madigan's responsive, non-privileged Skype communications in advance of her deposition. Productions from third parties indicate that in addition to Skype, Ms. Madigan used Telegram to communicate regarding issues related to XRP and Ripple. See BAMT 001440 and SEC-CSCAPITAL-E-0079141. As such, we request that Ripple produce responsive, non-privileged Telegram communications in advance of her deposition. Thank you, and please let us know your response by Tuesday.

Daphna

From: Guo, Joy
Sent: Friday, May 7, 2021 4:46 PM
To: Tenreiro, Jorge ; Bliss, Dugan ; Waxman, Daphna A. ; Daniels, Jon ; Stewart, Ladan F ; Hanauer, Benjamin J. ; Moye, Robert M.
Cc: Ceresney, Andrew J. ; Zornberg, Lisa ; Cowan, Jennifer R. ; Gulay, Erol ; Hirsch, Matt ; 'msolomon@cgsh.com' ; 'mflumenbaum@paulweiss.com' ; 'Bunting, Kristina' (kbunting@paulweiss.com) ; 'ajanghorbani@cgsh.com' ; 'mkellogg@kelloggghansen.com' ; 'rfigel@kelloggghansen.com' ; 'mgertzman@paulweiss.com' ; 'slevander@cgsh.com'
Subject: SEC v. Ripple Labs - Meet and Confer Letter

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Counsel – Please see the attached correspondence concerning our most recent meet and confer.

Best,

Joy

**Debevoise
& Plimpton**

Debevoise & Plimpton LLP

Joy Guo

Associate

jguo@debevoise.com

[REDACTED]

www.debevoise.com

This e-mail message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure. If you are not the intended recipient, please do not disseminate, distribute or copy this communication, by e-mail or otherwise. Instead, please notify us immediately by return e-mail (including the original message in your reply) and by telephone (you may call us collect in New York at 1-212-909-6000) and then delete and discard all copies of the e-mail. Thank you.

The latest version of our Privacy Policy, which includes information about how we collect, use and protect personal data, is at www.debevoise.com.